

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

PROMOS TECHNOLOGIES, INC., )  
Plaintiff, ) C.A. No. 06-788-JJF  
v. )  
FREESCALE SEMICONDUCTOR, INC., )  
Defendant. )

**NOTICE OF RE-DEPOSITION OF  
DEFENDANT FREESCALE SEMICONDUCTOR, INC.  
PURSUANT TO RULE 30(b)(6)**

PLEASE TAKE NOTICE that Plaintiff ProMOS Technologies, Inc., will re-take the deposition of Defendant Freescale Semiconductor, Inc. ("Freescale"), pursuant to Fed. R. Civ. P. 30(b)(6) and the Court's December 20, 2007 Order, on the topics set forth in Exhibit A hereto, beginning at 9:30 a.m. on January 7, 2008, or on such other date as counsel may mutually agree, at the offices of Ashby & Geddes, 500 Delaware Avenue, 8th Floor, Wilmington, DE 19899. The deposition will be recorded stenographically and by videotape.

Pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Freescale shall designate one or more officers, directors, managing agents, or other individuals to testify on its behalf as to matters known or reasonably known to Freescale regarding the topics set forth below. If more than one person is so designated, Freescale shall set forth in advance of the deposition the topic(s) or area(s) on which each designee will provide testimony.

## Definitions And Instructions

1. The term "Freescale" shall mean Freescale Semiconductor, Inc., and any parent, subsidiaries, divisions, affiliates, and/or branches of the foregoing entities, any wholly or partly owned entities of the foregoing, any and all predecessors and successors thereof, and any entities

acting or purporting to act for or on behalf of, or who are subject to the direction or control of, any of the foregoing entities, including agents, employees, officers, directors, attorneys, consultants, contractors, subcontractors and representatives.

2. The term "document" will have the same meaning as that term is given in the "Definitions" section of ProMOS Technology Inc.'s First Request for Production of Documents served April 12, 2007.

3. The term Freescale Product(s) shall refer to the products and cores identified in Exhibit 1 hereto.

#### **Topics For Examination At Deposition**

1. Documents maintained by Freescale that evidence the design and/or features of cache memories contained in Freescale Products.

2. Documents maintained by Freescale that evidence how cache memories are accessed in and/or used in Freescale Products.

3. Documents maintained by Freescale that evidence the design and/or features of cache memory controllers contained in Freescale Products.

4. Features associated with cache memories contained in Freescale Products.

5. Features associated with cache memory controllers contained in Freescale Products.

6. Any website maintained by Freescale and any information set forth therein that discloses features associated with cache memories or cache memory controllers contained in Freescale Products.

ASHBY & GEDDES

/s/ *John G. Day*

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Dated: December 28, 2007  
186941.1

**EXHIBIT 1**

603e  
e200  
e200z1  
e200z0  
e200z6  
e300  
e300c2  
e500  
e500v2  
e600  
dual e600  
G2  
G4  
8xx  
Coldfire v2  
Coldfire v3  
Coldfire v4  
Coldfire v4e  
Coldfire v5  
MC68060  
ARM 920T  
ARM926EJ-S  
ARM1136JF-S  
800 MHz/1GHz  
StarCore SC3400  
DSP extended core  
800 MHz/1GHz  
StarCore SC3400  
DSP core  
SC1400  
DSP 56300

any products that incorporate any of the foregoing cores

MPC7400  
MPC7450  
MPC604  
MPC604e  
MPC604ev  
MPC603  
MPC603e  
MPC603ev  
MPC601  
MPC620  
MPC750  
MPC740  
MPC755

MPC2605  
K2  
8569  
8526  
MPC5200  
MPC5200B  
MPC5510  
MPC5553  
MPC5554  
MPC5561  
MPC5565  
MPC5566  
MPC5567  
MPC7410  
MPC7445  
MPC7455  
MPC7447  
MPC7457  
MPC7447A  
MPC7448  
MPC823  
MPC823E  
MPC850  
MPC852T  
MPC853T  
MPC855T  
MPC857DSL  
MPC857T  
MPC859DSL  
MPC859T  
MPC860  
MPC860P  
MPC862  
MPC866  
MPC870  
MPC875  
MPC880  
MPC885  
MPC8247  
MPC8248  
MPC8250  
MPC8255  
MPC8260  
MPC8264  
MPC8265  
MPC8266  
MPC8270  
MPC8271  
MPC8272  
MPC8275  
MPC8280  
MPC8313  
MPC8313E  
MPC8321

MPC8321E  
MPC8323  
MPC8323E  
MPC8343E  
MPC8347E  
MPC8349E  
MPC8358E  
MPC8360E  
MPC8533E  
MPC8540  
MPC8541E  
MPC8543E  
MPC8544E  
MPC8545E  
MPC8547E  
MPC8548E  
MPC8555E  
MPC8560  
MPC8567E  
MPC8568E  
MPC8641  
MPC8641D  
MCF5206e  
MCF5207  
MCF5208  
MCF5211  
MCF5212  
MCF5213  
MCF5214  
MCF5216  
MCF5232  
MCF5233  
MCF5234  
MCF5235  
MCF5249  
MCF5270  
MCF5271  
MCF5272  
MCF5274  
MCF5274L  
MCF5275  
MCF5275L  
MCF5280  
MCF5281  
MCF5282  
MCF5307  
MCF5327  
MCF5328  
MCF5329  
MCF5372  
MCF5372L  
MCF5373

MCF5373L  
MCF5407  
MCF5470  
MCF5471  
MCF5472  
MCF5473  
MCF5474  
MCF5475  
MCF5480  
MCF5481  
MCF5482  
MCF5483  
MCF5484  
MCF5485  
MC68060  
MC68LC060  
MC68EC060  
i.MX1  
(MC9328MX1)  
i.MX21  
i.MX21S  
i.MX27  
i.MX31  
i.MX31L  
i.MXL  
i.MXS  
MSC8144  
MSC8144E  
MSC8144EC  
MSC7110  
MSC7112  
MSC7113  
MSC7115  
MSC7116  
MSC7118  
MSC7119  
MSC7120  
DSP56301  
DSP56311  
DSP56321  
DSP56L307